

BATHAE DUNNE LLP
Yavar Bathae (CA 282388)
yavar@bathaedunne.com
Andrew C. Wolinsky (CA 345965)
awolinsky@bathaedunne.com
445 Park Avenue, 9th Floor
New York, NY 10022
(332) 322-8835

Brian J. Dunne (CA 275689)
bdunne@bathaedunne.com
Edward M. Grauman (*pro hac vice*)
egrauman@bathaedunne.com
901 S. MoPac Expressway
Barton Oaks Plaza I, Suite 300
Austin, TX 78746
(213) 462-2772

*Interim Co-Lead Counsel for the
Advertiser Classes*

SCOTT+SCOTT ATTORNEYS AT LAW LLP
Amanda F. Lawrence (*pro hac vice*)
alawrence@scott-scott.com
Patrick J. McGahan (*pro hac vice*)
pmcgahan@scott-scott.com
Michael P. Srodoski (*pro hac vice*)
msrodoski@scott-scott.com
156 South Main Street, P.O. Box 192
Colchester, CT 06415
Tel.: (860) 537-5537

Patrick J. Coughlin (CA 111070)
pcoughlin@scott-scott.com
Carmen A. Medici (CA 248417)
cmedici@scott-scott.com
Hal D. Cunningham (CA 243048)
hcunningham@scott-scott.com
Daniel J. Brockwell (CA 335983)
dbrockwell@scott-scott.com
600 W. Broadway, Suite 3300
San Diego, CA 92101
Tel.: (619) 233-4565

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MAXIMILIAN KLEIN, et al.,

Plaintiffs,

v.

META PLATFORMS, INC.,

Defendant.

Case No. 20-cv-08570-JD

Hon. James Donato

**DECLARATION OF BRIAN J. DUNNE
IN SUPPORT OF ADVERTISER
PLAINTIFFS' MOTION TO EXCLUDE
THE EXPERT REPORT AND
TESTIMONY OF DR. CATHERINE
TUCKER**

1 I, Brian J. Dunne, declare and state as follows:

2 1. I am an attorney licensed in the State of California and admitted to the United States
3 District Court for the Northern District of California. I am a partner at Bathae Dunne LLP, counsel for
4 the Advertiser Plaintiffs in the above-captioned matter. I have personal knowledge of the facts set forth
5 herein and, if called as a witness, could and would testify competently to them.

6 2. This declaration is made in support of Advertiser Plaintiffs' Motion to Exclude the
7 Expert Report and Testimony of Dr. Catherine Tucker.

8 3. Attached as **Exhibit 1** is a true and correct copy of the Expert Report of Michael A.
9 Williams, Ph.D., dated July 7, 2023.

10 4. Attached as **Exhibit 2** is a true and correct copy of the Expert Report of Joshua S. Gans,
11 dated July 7, 2023.

12 5. Attached as **Exhibit 3** is a true and correct copy of the Advertiser Class Rebuttal Report
13 of Catherine Tucker, Ph.D., dated August 4, 2023.

14 6. Attached as **Exhibit 4** is a true and correct copy of the Reply Report of Joshua S. Gans,
15 dated September 1, 2023.

16 7. Attached as **Exhibit 5** is a true and correct copy of the Expert Reply Report of Michael
17 A. Williams, Ph.D., dated September 15, 2023.

18 8. Attached as **Exhibit 6** is a true and correct copy of excerpts from deposition of Catherine
19 Tucker, Ph.D., dated September 26, 2023.

20 9. Attached as **Exhibit 7** is a true and correct copy of excerpts from the deposition of Alex
21 Schultz, dated March 31, 2023.

22 I declare under penalty of perjury that the foregoing is true and correct. Executed on October 6,
23 2023, in Austin, Texas.

24 /s/ Brian J. Dunne
25 Brian J. Dunne

26

27

28